

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDY WANG, Derivatively on Behalf of Nominal Defendant TRAVELZOO, INC.,	:	Civil Action No. 1:11-cv-06125-GBD
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
HOLGER BARTEL, RALPH BARTEL, DAVID J. EHRLICH, DONOVAN NEALE- MAY, KELLY M. URSO, WAYNE LEE, and CHRISTOPHER LOUGHLIN,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
TRAVELZOO, INC.	:	
	:	
Nominal Defendant.	:	

ANTHONY A. WIRTH, Derivatively on Behalf of Nominal Defendant Travelzoo, Inc.,	:	Civil Action No. 1:11-cv-06378-GBD
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
HOLGER BARTEL, RALPH BARTEL, DAVID J. EHRLICH, DONOVAN NEALE- MAY, KELLY M. URSO, WAYNE LEE, and CHRISTOPHER LOUGHLIN,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
TRAVELZOO, INC.	:	
	:	
Nominal Defendant.	:	(continued on next page)

**PLAINTIFF ALBERT J. TURANSKY'S NOTICE OF MOTION TO CONSOLIDATE
RELATED ACTIONS AND APPOINT LEAD COUNSEL**

KEVIN KITT, Derivatively on Behalf of
Nominal Defendant TRAVELZOO, INC.,

Plaintiff,

v.

HOLGER BARTEL, RALPH BARTEL,
DAVID J. EHRLICH, DONOVAN NEALE-
MAY, KELLY M. URSO, WAYNE LEE,
and CHRISTOPHER LOUGHLIN,

Defendants,

and

TRAVELZOO, INC.

Nominal Defendant.

ALBERT J. TURANSKY, Derivatively on
Behalf of Nominal Defendant
TRAVELZOO, INC.,

Plaintiff,

v.

HOLGER BARTEL, RALPH BARTEL,
DAVID J. EHRLICH, DONOVAN NEALE-
MAY, KELLY M. URSO, WAYNE LEE,
and CHRISTOPHER LOUGHLIN,

Defendants,

and

TRAVELZOO, INC.

Nominal Defendant.

Civil Action No. 1:11-cv-07019-GBD

Civil Action No. 1:11-cv-07389-UA

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of William B. Federman, dated October 20, 2011, and the exhibits attached thereto, and upon all of the papers and pleadings filed in this action to this point, Plaintiff Albert J. Turansky will move this Court, before the Honorable George B. Daniels, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 21D, New York, New York, on a date and time set by the Court, for an Order, consolidating related actions and appointing lead counsel in these actions.

DATED: October 20, 2011

Respectfully Submitted,

FEDERMAN & SHERWOOD

/s/ William B. Federman

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2011, a true, correct, and exact copy of the within and foregoing was served by the Electronic Case Filing system to all counsel of record.

/s/ William B. Federman
William B. Federman